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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LISA KEITH,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01110-JAD-VCF

**JOINT STIPULATION FOR EXTENSION OF  
TIME AND ORDER**

**(Second Request)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from December 13, 2018 to **January 16, 2019**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel has a Ninth Circuit answering brief due next week which requires extensive and multiple levels of review by the agency and U.S. Attorney's Office. Counsel also has a Ninth Circuit oral arguments scheduled for the following week that also requires significant preparation and moot courts. Counsel was recently out of the office due to family emergency and health issues. Due to Counsel's unexpected leave and heavy workload, Counsel needs additional time

1 to adequately review the transcript and properly respond to Plaintiff's Motion for Summary Judgment.  
2 Defendant makes this request in good faith with no intention to unduly delay the proceedings. The  
3 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.  
4

5 Respectfully submitted,

6 Dated: December 11, 2018

/s/ Cyrus Safa  
(\*as authorized by email on December 7, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

9 Dated: December 11, 2018

DAYLE ELIESON  
United States Attorney

/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney

13 **APPROVED AND SO ORDERED:**

15  
16 12-11-2018  
DATED: \_\_\_\_\_

  
\_\_\_\_\_  
THE HONORABLE CAM FERENBACH  
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
3 **JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED] ORDER**  
4 on the date and via the method of service identified below:

5 **CM/ECF:**

6  
7 Cyrus Safa  
8 Law Offices of Lawrence D. Rohlfing  
9 12631 E. Imperial Highway, Suite C-115  
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17 Las Vegas, NV 89101  
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21 Attorneys for Plaintiff

22 Respectfully submitted this 11th day of December 2018,

23 /s/ Tina L. Naicker  
24 TINA L. NAICKER  
25 Special Assistant United States Attorney  
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